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 Antitrust Division  
 Attorneys for the United States

**FILED**

4 DEC - 4 2007

5 RICHARD W. WIEKING  
 6 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

7 UNITED STATES DISTRICT COURT

8 NORTHERN DISTRICT OF CALIFORNIA

9 SAN FRANCISCO DIVISION

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**PJH**

10 UNITED STATES OF AMERICA,	)	No.
11 Plaintiff,	)	UNITED STATES' MOTION TO
12 v.	)	SEAL INDICTMENT AND
13 MICHAEL BEKER, a.k.a.	)	ARREST WARRANT
14 Mikhail Lvovich, a.k.a. Mendel Beker,	)	DOCUMENTS AND [PROPOSED]
15 ARIE PRILIK and	)	ORDER
16 NEWCON INTERNATIONAL LTD.	)	([REDACTED])
17 Defendants.	)	

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18 The government hereby moves the Court for an order sealing this motion, the  
 19 Indictment, the arrest warrant documents, and the sealing order until further order of the  
 20 Court. The government requests that the order permit disclosure only to government  
 21 counsel identified on this motion, law enforcement officials assisting in the investigation,  
 22 and judicial officers, when necessary to perform their official duties. The defendants  
 23 reside in Canada. The government believes that disclosure of the existence of the  
 24 Indictment and arrest warrant, or the information contained in those documents, may  
 25 jeopardize the progress of an ongoing criminal investigation, in that disclosure might assist

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MOTION TO SEAL

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the defendants avoid this jurisdiction.

DATED: December 4, 2007

Respectfully submitted,

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## MOTION TO SEAL